

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED  
AUG 5 2004  
PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF:

JOINT APPLICATION OF KENTUCKY )  
UTILITIES COMPANY, KENTUCKY ASSOCIATION )  
FOR COMMUNITY ACTION AND COMMUNITY )  
ACTION COUNCIL FOR LEXINGTON - FAYETTE, ) CASE 2004 - 00303  
BOURBON, HARRISON AND NICHOLAS COUNTIES )  
FOR THE ESTABLISHMENT OF A HOME ENERGY )  
PROGRAM )

**REQUEST OF ROBERT L. MADISON FOR FULL INTERVENTION**

I REQUEST FULL INTERVENTION IN PSC CASE NO. 2003-00303, WHICH CONCERNS THE ESTABLISHMENT OF A HOME ENERGY ASSISTANCE PROGRAM (HEA) IN THE KENTUCKY UTILITIES TERRITORY.

I AM AN ELECTRIC ONLY RESIDENTIAL CUSTOMER OF LG&E. I HAVE BEEN PREVIOUSLY GRANTED FULL INTERVENTION IN THE FOLLOWING PSC CASES:

1. 98-426 PBR.
2. 2000-095 POWERGEN MERGER.
3. 2000-080 GAS INCREASE.
4. 2000-386 POLLUTION EQUIPMENT.
5. 2001-104 E.ON.
6. ADMINISTRATIVE 387 KY ADEQUACY OF GENERATION & TRANSMISSION.
7. 2001-323 HOME ENERGY ASSISTANCE.
8. 2002-00147 POLLUTION EQUIPMENT.
9. 2004-00029 ACQUISITION OF OLDHAM COUNTY SEWER DISTRICT.

IN ACCORDANCE WITH 807 KAR 5:0001 (3) (8), I FEEL THAT I HAVE A SPECIAL INTEREST IN THIS PROCEEDING WHICH IS NOT OTHERWISE ADEQUATELY REPRESENTED AND / OR THAT I AM LIKELY TO PRESENT ISSUES OR DEVELOP FACTS THAT WILL ASSIST THE PSC WITHOUT COMPLICATING OR DISRUPTING THE PROCEEDINGS.

THE REASON I AM ASKING FOR INTERVENTION IN THE KU CASE IS I MAY HAVE PROPOSALS THAT WILL IMPACT COUNTIES THAT HAVE BOTH LG&E AND KU AS UTILITY PROVIDERS. THE JOINT APPLICATION IN CASE NO. 2004 - 00304 DIFFERS SIGNIFICANTLY FROM THIS CASE. I MAY ARGUE THAT THE HEA'S SHOULD BE THE SAME. TO PREVENT A HYPER TECHNICAL ARGUMENT FROM ANOTHER PARTY, I AM REQUESTING FULL INTERVENTION IN BOTH CASES.

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DATE: 03 AUG 2004

I WAS GRANTED FULL INTERVENTION IN CASE 2001 - 323. THE CURRENT CASE IS A CONTINUATION OF THE PREVIOUS CASE. MANY OF THE ISSUES & RECOMMENDATIONS THAT I MADE IN THE PREVIOUS CASE WERE APPROVED BY THE PSC. THE ATTORNEY GENERAL (AG) CAN NOT REPRESENT MANY OF THE SPECIFIC ISSUES THAT I AND OTHERS (FROM PUBLIC COMMENT) HAVE RAISED IN THE PREVIOUS CASE BECAUSE OF THE AG'S CONSISTENT ADVOCACY OF LOW INCOME POSITIONS. THERE ARE OTHER POINTS OF VIEWS THAT NEED TO BE HEARD.

IN PREVIOUS PSC CASES I HAVE PARTICIPATED IN DATA REQUESTS, PRESENTED WRITTEN AND ORAL TESTIMONY, ASKED QUESTIONS AT THE HEARINGS AND FILED BRIEFS.

I CERTIFY THAT ON 03 AUG 2004, COPIES OF THIS LETTER WERE MAILED CERTIFIED TO THE PSC, REGULAR MAIL TO ALL OTHER PARTIES OF RECORD.

SINCERELY,

*Robert L. Madison*

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